

REDACTED
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

FILED

MAR 10 12 58 PM '05

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDRES RODRIGUEZ,

Defendant.

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Criminal Action No. 05 - 18 - UNA

CLERK
U.S. DISTRICT COURT
DISTRICT OF DELAWARE

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INDICTMENT

The Federal Grand Jury for the District of Delaware charges that:

COUNT I

On or about May 27, 2004, in the District of Delaware, the defendant, ANDRES RODRIGUEZ, knowingly transferred and used, in and affecting interstate commerce, and without lawful authority, a means of identification of another person, to wit, Puerto Rican birth certificates and social security cards, with the intent to aid and abet unlawful activity that constitutes a violation of federal law, to wit, Title 18, United States Code, Section 1546(b), which prohibits the use of an identification document, knowing that the document was not issued lawfully for the use of the possessor, for the purpose of satisfying a requirement of Title 8, United States Code, Section 1324a(b), to wit, the verification by an employer of an alien's

employment authorization status and identity, and as a result of this offense, the defendant obtained more than \$1,000 in a one year period, all in violation of Title 18, United States Code, Sections 1028(a)(7) and (b)(1)(D).

A TRUE BILL:

Foreperson

COLM F. CONNOLLY
United States Attorney

By: Adam Safwat
Adam Safwat
Assistant United States Attorney

Date: March 10, 2005

Clerk _____
Deputy _____
Defect this _____ day of _____, 2005.
to the indictment filed in this case.
hereby enter a bill of _____
indictment upon arraignment of the
been presented with a copy of the
presented